

Exhibit A

05/22/07 18:32 FAX 817.33074

ADMIRAL INS
WELLS FARGO INS SERVICES

(Rev. 4/97)

FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

COPY

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARERICARDO A. CASTILLO
(Enter above the full name of the plaintiff in this action)

No 04-210

v.

FRANK COSTAN Supervisor
VIDA DAWKINS Counselor
CIVIGENICS PROGRAM
(Enter above the full name of the defendant(s) in this action)

I. Previous lawsuits

A. Have you begun other lawsuits in state or federal courts dealing with the same facts involved in this action or otherwise relating to your imprisonment?
YES [] NO [X]

B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs n/aDefendants n/a

2. Court (if federal court, name the district; if state court, name it) N/A
3. Docket number N/A
4. Name of judge to whom case was assigned N/A
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A
- II. A. Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐
- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes ☒ No ☐
- C. If your answer is YES,
1. What steps did you take? I wrote to Internal Affairs
Captain Faria & also Director of Civil Rights Harry C.
investigating % Lt. Polk
2. What was the result? INTERNAL AFFAIRS INVESTIGATED
everything
- D. If your answer is NO, explain why not _____
- E. If there is no prison grievance procedure in the institution, did you complain to prison authorities? Yes ☒ No ☐
- F. If your answer is YES,
1. What steps did you take? SAME as above
2. What was the result? SAME as above

III Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff RICARDO CASTILLO
Address P.O. Box 9561 WILM. DE. 19809

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the names, positions, and place of employment of any additional defendants.)

B. Defendant FRANK COSTAN/VIDA DAWKINS is employed as SUPERVISOR &
COUNSELOR at GANDER HILL PRISON
C. Additional Defendants Civilianics program

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

SEE ATTACHED COMPLAINT

05/22/07 16:32 FAX 017330740

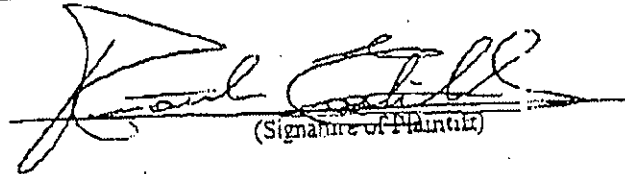
WELLS FARGO INS SERVICES

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal argument.
Cite no cases or statutes.)

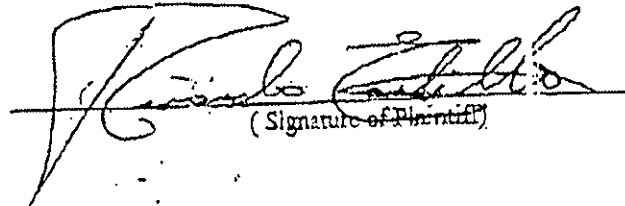
To BE AWARDED PUNITIVE AND COMPENSATORY
DAMAGES, AT THE DISCRETION OF THE COURT.

Signed this 30th day of MARCH, 2004.


(Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

3/30/04
Date


(Signature of Plaintiff)

SENT to hole on
12/24/03

to: Ricardo Castillo #328277: DM2 Now 1E-3
from: Violation of 1st Amendment by Sup. Frank Costantini CIVIGENICS
Re: VIDA DAWKINS cow.
Date: 12/24/03
NO COMP. 1 MONTH IN THE KEY PR.

At Palk on Monday 12/22/03 two individuals were involved in a fight a Spanish inmate & a black inmate, now the fight was broken up and I took the Spanish guy to his bunk, at this point I stayed with him to cool him off, but there a counselor who tried to give me a contract about a month ago happen to be the one to come in the dorm, only heard one side of the story, being black herself (Not that I'm prejudiced) she sided with the crowd of boys who are clicked with the black inmate, (mind you this is not a black or Spanish issue) and are also the top of the house which are the Program Manager which didn't see the fight but spoke against the Spanish guy to the Senior residents, all the while I had the Spanish guy blocked off & calm him down, but at no given time this so called counselor VIDA came to find out the Spanish guy side of the story is like she could care less, she already had pre-planned to send the Spanish guy to the hole, because when she came 1/2 hour later from only hearing one side, she already had everything laid out, but she came back in the dorm making drunken outburst, out of rage, because she's new to this type of environment and she made a lister up for nobody to talk to the Spanish guy but she never mention the same for the black guy, so I got up and yelled at her because she was far from where we were, that if she putz one on a lister-up, she has to put the other, so she got mad at me, and made more drunken outburst, at which point the 4 to 12 guard that night told her she had to leave 2 or 3 times and she was still yelling at him.

code, at which point she was still running her mouth of at him and in rage then she snapped and ran out of the dorm and into the key area, so I went to see her but she was too far running from what I don't know, but I shouted to her that if one goes the other had to too, but the guard noticed her radical, irrational & unprofessional behavior, first she's new, and 2nd she has never been under pressure, so she shouldn't be working here if she does not know how to handle herself under pressure, the guard said that he was going to write her up, because she confronted him plus more than one person told him about the racial activities going on the last couple of months, but the program manager Nathaniel W. & the senior residents kept covering it up and Sup Frank by getting rid of the individuals that bring it to the table, and that's how they solve the problems and keep it under the rug, because they threaten to give you a 30 day contract if you bring it to D.D.C., also the crack cocaine that they keep smoking, the cigarettes and the porno pages they are selling laminated for \$10.00 a page, I wrote it up but the write ups disappear, because Sup. Frank is trying to shut me & others up so that D.D.C. don't catch wind and shut down dorm II, also other fights that have taken place and I wrote it up just last month when I was a senior resident but they ousted me because it was their homies displaying behaviors, also because I put the whole family on a L.E. and wake them up at 5:30 A.M. in order to teach 'em to respect D.D.C. when its count time and also those that are in job positions, so they fired me for that, to shut me up and now for standing up for what I believe is just, they are accusing me of being a threat, and that I also threaten a counselor, that's preposterous, I can't live,

Sent to hole
12/27/03

"No Camp 14 months in the"
Key pr

Page II "furthermore, when is it a crime or a threat to
be vocal? Like the 1st Amendment says, its only
violated when its addressed or used improper or acting
upon ones beliefs, but at no giving time was I no where near
this counselor in order for me to have threaten her,
and for what reason would I subject myself to threatening
this woman who she never did anything to me and it was
not my fight, what could I have possibly said to her,
it doesn't make any sense, blatant lies to cover-up
another serious unjust to keep me shut from raising
the issue about unfair treatment in the Key program.
Please imagine with the %o that night in question if
at any moment I was a threat to him or anybody
and ask him if I was ever up close with this counselor
which I never was, cause I was still holding down the
spanish guy and all I did besides that all night long
was assist and stay by the %o side through the
night in order to, I was late for the spanish guy.
so how is it my fight now and what words did
I use to threaten this lady. When I was NEVER near
her or ever approached her in any way shape or form
especially with all the chaos going on, I hadn't no
time, except when I voiced my opinion & that was
not a threat, ask the guard and also ask
morning %o suvie or the regular night %o Jordan
if I have ever crossed the lines, anything I have
at 41 years of age, that I must respect authority
and I do not have a track record of this such
nature, but I will with respect voice my opinion when
wrong is wrong, & since you're in charge, I'd like a
this incident report back in order to make copies & send it
to director Harry & the regional director that's what
they are all sense of and now, I'm putting all the
pieces where it needs to be, its been dormant to long

about all the cover-ups with incidents not being reported to
the proper authorities, Sup. Frank is trying to hold on to his
job at any cost, and uphold the integrity of a failing
program, somebody bound to investigate all the illegal
crack smoking, cigarette sales & porno pages being sold
as I reported it last Friday and also turned in the
matches which they left behind after smoking crack on
12/18/03 then on 12/21/03 1:30 A.M. cigarette in the back of
the bathroom while the Yo slept and I witnessed the
P.M. go to the sink near the bathroom and just started
at his friends without saying a word it's a serious
covert operation going on and the little guys are
paying the price, but I'm not the only witness at least
half of the dorm will testify without a problem cause
they too are fed up with all the cover-ups going on
in their, I reported to the supervisor but he didn't
want to hear about it and that's why, and the major
reason why I'm interested to 'em for trying to clean up
his dirt, but the top of the house is where the problems
lies, Director Harry has no knowledge of all this cover-up
going on in both dorms, you need to talk to him Mr. Polk.
This problem is bigger than both of you guys, I'm also
planning to write to the newspaper about cybergenics
not having Spanish speaking counsellors and they are
giving treatment without helping individuals with drug
problems & compelling them from the program without ever
knowing a thing, they are robbing you and all the
taxpayers money, claiming that they are rehabing
people that can't speak English, I've helped these
individuals and some are still there rotting away,
also others are here for supposedly Non-Complaint, but that's
how they shut me those that bring 'em out to D.A.C. and
they exclaim we are a threat, but talk to Capt Lee & Capt Emig
they are aware of others coming forth, & reporting the same problems

2004 APR -6 PM 3:45

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RICARDO A. CASTILLO,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-210-GMS
)	
SUPERVISOR FRANK COSTAN,)	
et al.,)	
)	
Defendants.)	

ORDER

WHEREAS, the plaintiff filed a civil rights action pursuant to 42 U.S.C. § 1983 without prepayment of the filing fee;

WHEREAS, on March 31, 2006, the court entered an order requiring the plaintiff to complete and return USM-285 forms for each defendant, informing the plaintiff that the United States Marshal would not serve the complaint until all USM-285 forms were received by the Clerk of the Court, and that failure to provide the USM-285 forms within 120 days from the date of the order may result in the complaint being dismissed or the defendant being dismissed pursuant to Fed. R. Civ. P. 4(m) (D.I. 15);

WHEREAS, to date, none of the required USM-285 forms have been received from the plaintiff;

THEREFORE, at Wilmington this 9th day of August, 2006, IT IS HEREBY ORDERED that the plaintiff's complaint is DISMISSED WITHOUT PREJUDICE pursuant to Fed. R. Civ. P. 4(m).

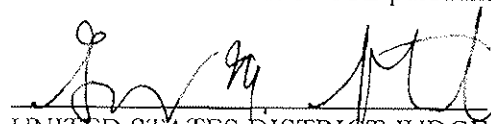
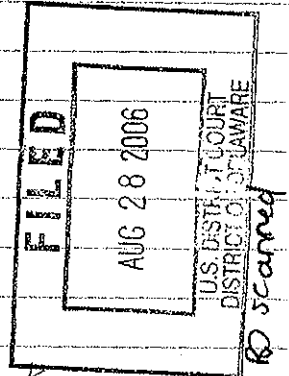

UNITED STATES DISTRICT JUDGE

Exhibit C

To: Honorable Judge Gregory M. Sleet
 From: Ricardo Castillo
 Re: REOPEN CASE
 Date: 8/22/06
 CIV. ACT. # 04-210-GMS

Honorable
 Judge Gregory M. Sleet



Honorable Gregory M. Sleet, I ask
 with all due respect that you reopen
 my case, reason being is that the
 court's filing staff has misplaced
 most of all papers I've filed or
 father had helped from and in house
 or jailhouse paralegal, first my filing
 fees which I produced 3 times to
 the court clerks, Mrs. Monica Mosley
 and now they can't find the USM-285
 which I and my "legal help" filed prior
 to me coming out. I now ask the
 honorable judge to please reopen my case.
 I did personally requested that these docs.
 be sent to me immediately so that I
 can refile them as asked by the
 court's request, though I was never
 prior till now requested these forms

Thank you
 Honorable Judge
 Sleet

Ricardo Castillo Civ. Act. #04-210-GMS
30 Wintethaven Dr. APT. 7
New, DE. 19702

WILMINGTON DE 197

25 AUG 2006 PM 2 T



U.S.D.C.

CLERKS OFFICE

844 N. King St. Lockbox 19

Wilmington, DE 19801-3570

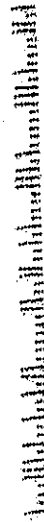
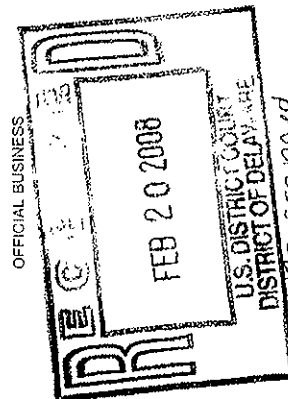


Exhibit D

Office of the Clerk
United States District Court
844 N. King Street, Lockbox 18
Wilmington, Delaware 19801-3570



RECEIVED
FEB 19 2008
Rafael A. Castillo, Pro se
30 Wintehaven Dr.
Apt. 7
Newark, DE 19702



RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD
BC: 19899001818 *1927-09974-15-18
1989900018

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Ricardo Castillo	:	CIVIL ACTION NO.: 04-210-GMS
	:	
Plaintiff	:	
	:	
v.	:	
	:	
Frank Costan and	:	
Vida Dawkins,	:	
	:	
Defendants	:	

DEFENDANTS FRANK COSTAN AND VIDA DAWKINS'
SELF-EXECUTING DISCLOSURE STATEMENT

Defendants, Frank Costan and Vida Dawkins, submit the following Initial Disclosure Statement pursuant to Fed.R.Civ. P. 26.

I. INTRODUCTION:

1. Defendants submit this Disclosure Statement without waiver of any applicable privilege.

2. Defendants expressly reserve the right to object to the admissibility of any information contained in or derived from this Disclosure Statement prior to or at the time of trial.

3. Defendants does not concede the relevancy of any information contained in or derived from this Disclosure Statement.

4. Defendants disclaim a need to supplement this Disclosure Statement beyond the requirements set forth in the Federal Rules of Civil Procedure.

II. DISCLOSURE:

A. Disclosure Pursuant to Fed.R.Civ.P. 26(a)(1)(A).

The following witnesses are reasonably likely to have information that may bear on the claims and defenses of this action:

1. Frank Costan, Defendant

c/o Defense counsel

2. Vida Dawkins, Defendant
c/o Defense counsel

Defendant has identified the foregoing witnesses as individuals who are reasonably likely to have information concerning potential claims and/or defenses that may be asserted in this case. This list includes the names of people who Defendants, at this time, believe may have such information; however, the investigation is continuing. Accordingly, Defendant reserves the right to supplement this list of witnesses as new witnesses are identified and/or discovered.

B. Disclosure Pursuant to Fed.R.Civ.P. 26(a)(1)(B).

The following documents, data, compilations, and/or tangible things are in possession, custody or control of Defendant and will be supplied. Defendant reserves the right to supplement this list as new documents, data compilations, and/or tangible things are identified and discovered:

1. Plaintiff's complete file

C. Disclosure Pursuant to Fed.R.Civ.P. 26 (a)(1)(C).

Not applicable.

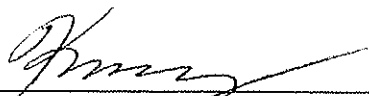
D. Disclosure Pursuant to Fed.R.Civ.P. 26(a)(4)(D).

Defendants are covered by an insurance policy with Admiral Insurance Company. A copy of the policy has been request from the carrier and will be supplied.

Respectfully submitted,

DEASEY, MAHONEY & VALENTINI, LTD.

BY:



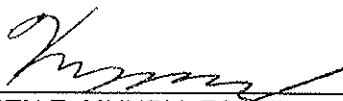
KRYSTN E. MUNDY, ESQUIRE
Attorney for Defendants,
Frank Costan and Vida Dawkins

Dated: April 23, 2008

CERTIFICATE OF SERVICE

I, Krystn E. Mundy, Esquire hereby certify that on the 23rd day of April 2008 a true and correct copy of Defendants' Request for Admissions was served upon the parties listed below via the United States Postal Service:

Mr. Ricardo A. Castillo
30 Winterhaven Drive
Apartment 7
Newark, DE 19702



KRYSTN E. MUNDY, ESQUIRE

Dated: April 23, 2008

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Ricardo Castillo	:	CIVIL ACTION NO.: 04-210-GMS
	:	
Plaintiff	:	
	:	
v.	:	
	:	
Frank Coston and	:	
Vida Dawkins,	:	
	:	
Defendants	:	

REQUEST FOR ADMISSIONS ADDRESSED TO RICARDO CASTILLO

These Requests shall be answered in writing under oath within thirty (30) days from service hereof pursuant to the Rules of this Court. The failure to respond within thirty (30) days will be deemed an Admission by the party to whom the requests are directed.

These Requests shall be deemed to be continuing in nature so as to require supplemental Answers if further information is obtained between the date these Answers are filed and the date of trial.

Request 1: Plaintiff filed a grievance regarding the incident of December 23, 2003.

Answer:

Request 2: Plaintiff did not receive any notice of the outcome of said grievance.

Answer:

Request 3: Because Plaintiff did not receive the outcome of the grievance, Plaintiff did not appeal said outcome.

Answer:

Request 4: Plaintiff failed to exhaust administrative remedies by failing to appeal the outcome.

Answer:

Request 5: Plaintiff did not suffer any physical injuries as a result of the events of December 23, 2003.

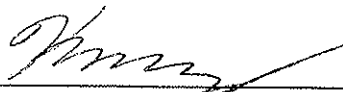
Answer:

Request for Production No. 1

Any and all documents which you rely upon, or which contain any of the facts upon which you rely, in making your Answer(s) to the foregoing Requests for Admission.

DEASEY, MAHONEY & VALENTINI, LTD.

By:



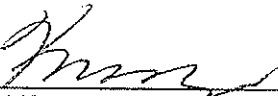
KRYSTN E. MUNDY, ESQUIRE
Attorney for Defendants,
Frank Costan and Vida Dawkins

Dated: April 23, 2008

CERTIFICATE OF SERVICE

I, Krystn E. Mundy, Esquire hereby certify that on the 23rd day of April 2008 a true and correct copy of Defendants' Interrogatories was served upon the parties listed below via the United States Postal Service:

Mr. Ricardo A. Castillo
30 Winterhaven Drive
Apartment 7
Newark, DE 19702



KRYSTN E. MUNDY, ESQUIRE

Dated: April 23, 2008

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Ricardo Castillo	:	CIVIL ACTION NO.: 04-210-GMS
	:	
Plaintiff	:	
	:	
v.	:	
	:	
Frank Costan and	:	
Vida Dawkins,	:	
	:	
Defendants	:	

DEFENDANTS FRANK COSTAN AND VIDA DAWKINS, FIRST SET OF
INTERROGATORIES DIRECTED TO PLAINTIFF

Defendants Frank Costan and Vida Dawkins, through their attorneys, Deasey, Mahoney & Valentini, Ltd., hereby serve these interrogatories upon Plaintiff. Pursuant to the Federal Rules of Civil Procedure, these interrogatories are to be answered, under oath, within thirty (30) days of service. These Interrogatories are deemed to be **continuing** and any additional information secured subsequent to the service of your answers hereto, which would have been included in the answers had it been known or available to you at the time of service of such answers, shall be supplied by supplemental answers to Interrogatories as soon as such information becomes known or available to you prior to trial of this action.

PLEASE TAKE NOTICE that the Defendants Frank Costan and Vida Dawkins, hereby serves upon Plaintiff the following written Interrogatories pursuant to Fed. R. Civ. P. 33. The answers to the following written Interrogatories are to be signed by the party answering them and answered in accordance with the Federal Rules of Civil Procedure and the following instructions and definitions:

INSTRUCTIONS

1. Type or write legibly your answers in the space following each Interrogatory. If the space provided following any Interrogatory is insufficient to write your full response, continue your response on a supplemental sheet or sheets of paper, making clear to which Interrogatory the continued response belongs.
2. Each Interrogatory shall be answered fully and completely unless objected to, in which event the reasons for the objection shall be stated in lieu of an answer. If you object to an interrogatory, state which and all of your reasons for each objection you make in response to an interrogatory. If it is claimed that an answer to an Interrogatory or documents is privileged, work product, or otherwise protected from disclosure, state such privilege, identify such information by its matter, and state with particularity the facts and grounds constituting the nature and basis for any such claim of privilege, work product or other grounds for nondisclosure.
3. The answers to the interrogatories shall be signed by the person making them and any objection shall be signed by the attorney or party making them. A statement of any objection shall not excuse the answering party from answering all remaining interrogatories to which no objection is stated.
4. If an interrogatory does not specifically request a particular fact, but such fact is necessary to make the answer comprehensive, complete or not misleading, you are to include such fact as part of the answer and these interrogatories shall be deemed

specifically to request such fact. If you currently lack information to answer any interrogatory completely, please state:

- a. the responsive information currently available.
- b. the responsive information currently unavailable.
- c. the efforts which you intend to make to secure the information currently unavailable; and
- d. when you anticipate receiving the information currently unavailable.

5. If any interrogatory or portion thereof requests information already provided in response to an earlier request, you may respond by specifying the document, or portion thereof which contains the information sought.

6. Within thirty (30) days of service of these interrogatories, send the original of your answers to Defendant's counsel. Do not file your answers with the court, rather forward to Defendant's counsel whose name appears below:

Krystn E. Mundy, Esquire
DEASEY MAHONEY & VALENTINI, LTD.
1601 Market Street, Suite 3400
Philadelphia, PA 19103

7. Pursuant to Federal Rules of Civil Procedure 26(e), these interrogatories are continuing in character so as to require you to promptly supplement and amend answers if you obtain further or different information relevant to these Interrogatories prior to trial. If at any time after service of your responses, you become aware of relevant information or that any of your answers were incorrect when made, or correct when made but no longer correct, promptly correct your answer in a supplemental

response and immediately serve that supplemental response upon defendant's counsel as provided above.

INTERROGATORIES

1. State Plaintiff's employment history for the past ten (10) years, including the dates of employment, the name and address of the employers, immediate supervisors, the rate of pay, the job title and a brief description of the duties involved.

2. Identify each and every witness or other person upon whom Plaintiff relies on making allegations contained in his Complaint and include the last known address and telephone number of such person(s). Please identify which of these persons will be called as witnesses at trial.

3. Identify each and every criminal charge filed against Plaintiff in the past ten (10) years, including the town or city wherein the charge was filed and the ultimate disposition of such charge.

4. Please identify all communications between Plaintiff and any representative of the Plaintiff with any Defendant regarding this case. Please include the type of communication, the substance of the communication, the date of the communication and the parties involved in the communication.

5. With respect to your claim that the Defendants had a policy or custom of violating citizen's rights, please identify the factual basis for this accusation, including the names of any witnesses you believe support this claim.

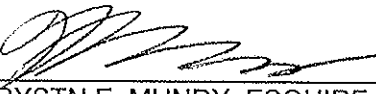
6. Please identify all psychiatric treatment provided to Plaintiff in the past ten(10) years. Please include the name and address of the provider, the services and dates rendered.

7. Please provide the names and addresses of Plaintiff's medical providers for the last fifteen (15) years.

8. Please provide the amount, in detail, of any damages, permanent or otherwise, emotional, physical , economic, or otherwise, that Plaintiff claims he suffered because of the Defendants' alleged actions.

DEASEY, MAHONEY & VALENTINI, LTD.

By:



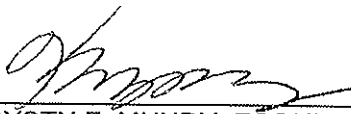
KRYSTN E. MUNDY, ESQUIRE
Attorney for Defendants,
Frank Costan and Vida Dawkins

Dated: April 23, 2008

CERTIFICATE OF SERVICE

I, Krystn E. Mundy, Esquire hereby certify that on the 23rd day of April 2008 a true and correct copy of Defendants' Interrogatories was served upon the parties listed below via the United States Postal Service:

Mr. Ricardo A. Castillo
30 Winterhaven Drive
Apartment 7
Newark, DE 19702



KRYSTN E. MUNDY, ESQUIRE

Dated: April 23, 2008

Exhibit F

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

AT LAW - PROCTORS IN ADMIRALTY
SUITE 3400
501 MARKET STREET
ADELPHIA, PA 19103-2301
215-587-9400
FACSIMILE: 215-587-9456

IL: KMUNDY@DMVLAWFIRM.COM
CE-MAIL EXTENSION #190

NEW JERSEY OFFICE
80 TANNER STREET
HADDONFIELD, NJ 08033-2319
856-429-6331
FACSIMILE 856-429-6562

MEDIA OFFICE
SUITE 101
103 CHESLEY DRIVE
MEDIA, PA 19063
610-892-2732
FACSIMILE: 610-892-2926

OF COUNSEL
FRANK C BENDER
WILLIAM R. DEASEY
1951-1993
JAMES G. BARNES
1988-1997
† ALSO MEMBER NJ BAR
‡ ALSO MEMBER CA BAR
§ ALSO MEMBER NY BAR
± ALSO MEMBER NV BAR

Sent To
Mr. Ricardo A. Castillo
Street, Apt. No.,
or PO Box No. *30 Winterhaven Dr.*
City, State, ZIP+4 *NEWARK, DE 19702*
PS Form 3800, August 2006 See Reverse for Instructions

MICHAEL F. SCHLEIGH†
DIANA P. SISUM†
LISA A. BLACKWOOD
KRYSTN E. MUNDY±
MATTHEW J. JUNK†
KYLE J. KELLER†
JORDAN S. NAMEROW†
BARBARA C. MORROW†

May 29, 2008

Sent Via Certified Mail and Regular U.S. Mail

Mr. Ricardo A. Castillo
30 Winterhaven Drive
Apartment 7
Newark, DE 19702

RE: Castillo v. Costan and Dawkins
Our File No.: 411.22656

Dear Mr. Castillo:

Please allow this letter to serve as a reminder that your answers to the Interrogatories and Request for Production of Documents, sent to you on **April 23, 2008**, are overdue. Please send complete and verified responses within the next ten (10) days to avoid the filing of a Motion to Compel your responses.

Thank you for your attention to this matter.

Very truly yours,

DEASEY, MAHONEY & VALENTINI, LTD.

By:

Krystn E. Mundy
KRYSTN E. MUNDY, ESQUIRE

KEM:dc

Exhibit G

CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

MAHONEY & VALENTINI, LTD.

AT LAW - PROCTORS IN ADMIRALTY
SUITE 3400
501 MARKET STREET
PHILADELPHIA, PA 19103-2301
215-587-9400
FACSIMILE: 215-587-9456

NEW JERSEY OFFICE
80 TANNER STREET
HADDONFIELD, NJ 08033-2419
856-429-6331
FACSIMILE: 856-429-6562

MEDIA OFFICE
SUITE 101
103 CHESLEY DRIVE
MEDIA, PA 19063
610-892-2732
FACSIMILE: 610-892-2926

E-MAIL: KMUNDY@DMVLAWFIRM.COM
VOICE-MAIL EXTENSION #190

OF COUNSEL:
FRANK C. BENDER
WILLIAM R. DEASEY
1951-1993
JAMES G. BARNES
1988-1997
† ALSO MEMBER NJ BAR
† ALSO MEMBER CA BAR
o ALSO MEMBER NY BAR
± ALSO MEMBER NV BAR

Sent To **Mr. Ricardo Castillo**
Street, Apt. No.,
or PO Box No. **30 Winterhaven Dr. Apt 7**
City, State, Zip+4 **Newark, DE 19702**

June 6, 2008

PS Form 3800, August 2006 See Reverse for Instructions
MICHAEL F. SCHLEIGH†
DIANA P. SISUM†
LISA A. BLACKWOOD
KRYSTN E. MUNDY±
MATTHEW J. JUNK†
KYLE J. KELLER†
JORDAN S. NAMEROW†
BARBARA C. MORROW†

7008 1140 0001 5279 3435

Sent Via Certified Mail and Regular U.S. Mail

Mr. Ricardo A. Castillo
30 Winterhaven Drive
Apartment 7
Newark, DE 19702

RE: Castillo v. Costan and Dawkins
Our File No.: 411.22656

Dear Mr. Castillo:

Please allow this letter to serve as a reminder that your answers to the Interrogatories and Request for Production of Documents, sent to you on **April 23, 2008**, are overdue. Please send complete and verified responses within the next five (5) days to avoid the filing of a Motion to Compel your responses.

Thank you for your attention to this matter.

Very truly yours,

DEASEY, MAHONEY & VALENTINI, LTD.

By:


KRYSTN E. MUNBY, ESQUIRE

KEM:dc

Exhibit H

DEASEY, MAHONEY & VALEN

SUITE 3400

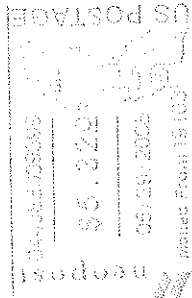
1601 MARKET STREET

PHILADELPHIA, PA 19103-2301

REGISTERED MAIL



7008 0500 0000 5038 0073



MR. SANTIAGO A. CASTILLO
1601 MARKET STREET
PHILADELPHIA, PA 19103-2301

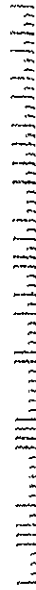
NIXIE

197 SC 1 25 06/19/08

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

SC: 19103230599 *1927-01988-19-26

19103230599



5/30
115

PS Form 3811, February 2004
102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Ricardo A. Castillo
30 Winterhaven Drive
Apartment 7
Newark, DE 19702

COMPLETE THIS SECTION ON DELIVERYA. Signature
X☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered ☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number

(Transfer from service label)

7 7008 0500 0000 5038 0073

13

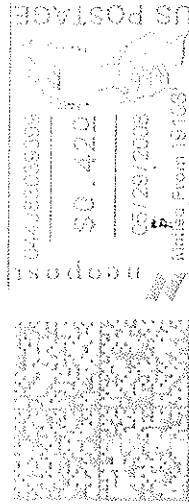
PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

DEASEY, MAHONEY & VALENTINI, LTD.

SUITE 3400
1601 MARKET STREET
PHILADELPHIA, PA 19103-2301



Return to Sender

(Not current Resident)

MR. RICARDO A. CASTILLO
30 WINTERHAVEN DRIVE
APARTMENT 7
NEWARK, D

NIXIE

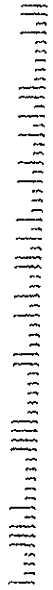
197 CE 1

25 05/05/08

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

BC: 19103239550 *2097-00602-29-42

1910323955



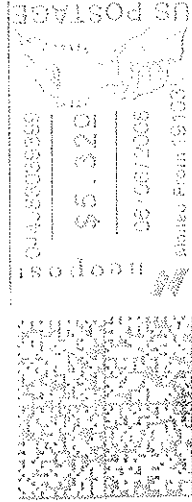
1910323955

DEASEY, MAHONEY & VALEN

SUITE 3400
1601 MARKET STREET
PHILADELPHIA, PA 19103-2301



7008 1140 0001 5279 3435

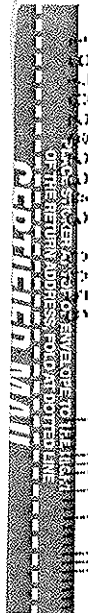


Rnk

MR. RICARDO A. CASTILLO
30 WINTERHAVEN DRIVE
APARTMENT 7
NEWARK, DE 19702



A ☐ INSUFFICIENT ADDRESS
C ☒ ATTEMPTED NOT KNOWN
S ☐ NO SUCH NUMBER/ STREET
☐ NOT DELIVERABLE AS ADDRESSED
- UNABLE TO FORWARD

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Ricardo Casti 110
30 Winterhaven Drive
Apartment 7
Newark, DE 19702

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent ☐ Addressee
- B. Received by (Printed Name) C. Date of Delivery
- D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type
- ☒ Certified Mail ☐ Express Mail
- ☐ Registered ☒ Return Receipt for Merchandise
- ☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number

(Transfer from service label)

700811400001 S279 3435

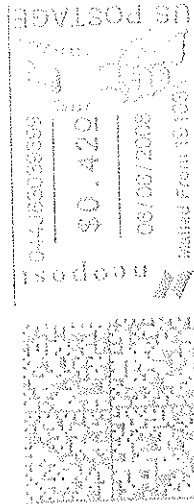
PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

DEASEY, MAHONEY & VALENTINI, LTD.

SUITE 3400
1601 MARKET STREET
PHILADELPHIA, PA 19103-2301



Kupfer

MR. RICARDO A. CASTILLO
30 WINTERHAVEN DRIVE
APARTMENT 7
NEWARK, DE 19702

NIXIE

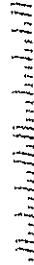
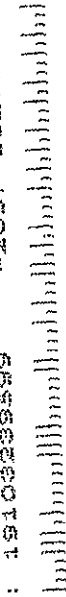
197 DE 1

CO 06/11/08

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD

EC: 19103233333

*2597-18270-05-41



ANK